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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JOHN J. SURINA, JR., trustee of the Elizabeth Sophia Surina Trust and Nicholas William Surina Trust; BRUCE LANDREY, an individual; PAUL LORENZINI, an individual; RICHARD SANDVIK, an individual; EDWARD G. WALLACE, an individual; JACK A. BAILEY, an individual; GARY CARL BARBOUR, an individual; PAUL D. BENNETT, an individual; JAMES E. CARTER, an individual; CHARLES MARCINKIEWICZ, trustee of the Charles & Kathleen Marcinkiewicz Trust; MICHAEL S. MCGOUGH, an individual; CHRISTOPHER RUNCKEL, an individual; and JOE CLAYTON TURNAGE, an individual; on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Case No. 3:22-cv-01410-YY

**PLAINTIFFS' UNOPPOSED MOTION
FOR APPROVAL TO EXCEED PAGE
LIMITATIONS**

**EXPEDITED CONSIDERATION
REQUESTED**

NUSCALE POWER, LLC, an Oregon limited liability company; FLUOR ENTERPRISES, INC., a California corporation; JAPAN NUSCALE INNOVATION, LLC, a Delaware limited liability company; SARGENT & LUNDY NUHOLDINGS, LLC, an Illinois limited liability company,

Defendants.

CERTIFICATE OF COMPLIANCE WITH LR 7-1

Pursuant to Local Rule 7-1(a), counsel for Plaintiffs certify that they conferred with counsel for Defendants, and Defendants do not oppose this Motion.

MOTION

Pursuant to LR 7-2(b)(1), Plaintiffs request approval to file a single, omnibus response to the three motions to dismiss filed by Defendants [Dkt. Nos. 18, 21 and 22]. Plaintiffs request approval to file a single response that will not exceed 50 pages in length.

This request is reasonable in light of the 71 pages of briefing collectively filed by Defendants in support of their motions. Plaintiffs would be allowed, pursuant to Local Rule 7-2, to file three responses of 35 pages each. A single, over-length brief is more efficient and economical, and is appropriate in light of the related and overlapping arguments made by Defendants.

DATED this 13th day of January, 2023.

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

By: s/Timothy S. DeJong

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